

EXHIBIT H

Bhimani, Jay

From: Shen, Andrew C. <ashen@khhte.com>
Sent: Tuesday, March 17, 2015 1:02 PM
To: Bhimani, Jay
Cc: Horowitz, David I.; Rose, Kristin; Klenov, Michael; Dorris, Daniel V.
Subject: RE: NCUA's Amended Responses and Objections to Defendants' FirstSetof Joint Interrogatories

Jay –

The documents we've cited pursuant to Fed. R. Civ. P. 33(d) provide the information sought by Defendants' interrogatories.

As to your additional request that we identify particular fields in the cited documents, we would be interested in working cooperatively with Defendants to identify and discuss relevant fields in the cited documents for both NCUA's and Defendants' interrogatory responses. For instance, NCUA has served interrogatories requesting the type of due diligence performed on each Mortgage Loan selected for Due Diligence, the process of how each Mortgage Loan was selected for each type of diligence, and the final principal or material conclusions reached relating to these loans. RBS has cited to hundreds of documents pursuant to Rule 33(d) without any indication of which documents, or which specific portions of those documents contain the information requested by the interrogatory. The responses of other Defendants are similarly defective. We would like to propose a process whereby Defendants agree to direct NCUA to specific portions and fields in these documents that they contend provide the information sought by NCUA's interrogatories, and identify all information sought by the interrogatories that is not contained in those documents, provided of course that NCUA agrees to do the same.

Regards,

Andy

Andrew C. Shen
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From: Bhimani, Jay [mailto:jay.bhimani@kirkland.com]
Sent: Tuesday, March 10, 2015 9:19 PM
To: Shen, Andrew C.
Cc: Horowitz, David I.; Rose, Kristin; Klenov, Michael; Dorris, Daniel V.
Subject: RE: NCUA's Amended Responses and Objections to Defendants' FirstSetof Joint Interrogatories

Andy -- thanks for that clarification. NCUA's interrogatory response notes that the Barclays spreadsheet (NCUA_A_0009138) contains information regarding "Barclays' pricing of the NGN notes." To be clear, what we're looking for is the consideration NCUA received in connection with its disposition of the Underlying Securities (not the pricing of the notes ultimately issued by the NGN trusts). I understand your e-mail below to mean that this information is also contained within the Barclays spreadsheet. If that is correct, will you please identify the particular fields of the spreadsheet containing this information, and confirm this in an interrogatory response.

Best regards,
Jay

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From: Shen, Andrew C. [<mailto:ashen@khhte.com>]
Sent: Friday, March 06, 2015 2:32 PM
To: Bhimani, Jay
Cc: Horowitz, David I.; Rose, Kristin; Klenov, Michael; Dorris, Daniel V.
Subject: RE: NCUA's Amended Responses and Objections to Defendants' FirstSet of Joint Interrogatories

Jay --

NCUA has directed Defendants to documents that provide all of the information necessary to fully answer this interrogatory. The NGN closing and offering documents set forth all of the terms of the conveyances of the Underlying Securities, and the Barclays spreadsheet shows the amount that the NCUA as liquidating agent received in the NGN transactions on account of each of the Underlying Securities. If you think this is insufficient to answer the interrogatory, please explain exactly what information you believe is missing.

Regards,

Andy

From: Bhimani, Jay [<mailto:jay.bhimani@kirkland.com>]
Sent: Thursday, March 05, 2015 10:29 AM
To: Shen, Andrew C.
Cc: Horowitz, David I.; Rose, Kristin; Klenov, Michael; Dorris, Daniel V.
Subject: FW: NCUA's Amended Responses and Objections to Defendants' FirstSet of Joint Interrogatories

Andy --

We write concerning NCUA's amended responses to Credit Union Interrogatory No. 6, which requests, among other things, a response from NCUA stating "the cumulative income received on each [] Certificate, whether that Certificate was sold, the price of the sale, [and] the date of the sale." As we explained in our previous meet and confers, NCUA's previous response did not provide sufficient information concerning NCUA's disposition of certificates in the NGN Program. NCUA's amended responses do not address our concerns. Although NCUA sponsored the NGN securitizations, its amended response simply cites a spreadsheet produced by one of the underwriters for these issuances, Barclays Capital Inc. ("Barclays"), in response to document requests served by NCUA, noting that it reflects "Barclays' pricing of

the NGN notes." This is insufficient. Please confirm what specific information in this spreadsheet reflects the specific information sought by our requests. Or, if the requested information is not contained within the spreadsheet according to NCUA, please provide it separately.

If NCUA does not commit to do this by this Monday, we intend to move to compel.

Best regards,
Jay

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From: Dorris, Daniel V. [<mailto:ddorris@khhte.com>]

Sent: Tuesday, March 03, 2015 3:50 PM

To: Dorris, Daniel V.; [*bsteiner@jenner.com](mailto:bsteiner@jenner.com); [*cchiou@jenner.com](mailto:cchiou@jenner.com); [*cgrabenstein@jenner.com](mailto:cgrabenstein@jenner.com); 'Faiza H. Alhambra (faiza.alhambra@huschblackwell.com)'; Campbell, Gavin; [*Hannah.Shearer@mto.com](mailto:Hannah.Shearer@mto.com); [*jmgoodin@lockelord.com](mailto:jmgoodin@lockelord.com); 'James Moloney'; 'Jane Alison Auxter'; [*jjordan@foulston.com](mailto:jjordan@foulston.com); [*jeff.kalinowski@bryancave.com](mailto:jeff.kalinowski@bryancave.com); Wieland, Jennifer; Shaw, John; [*ksberman@ecjlaw.com](mailto:ksberman@ecjlaw.com); [*LGrossbard@cravath.com](mailto:LGrossbard@cravath.com); 'Martin Loring'; [*mthomas@jenner.com](mailto:mthomas@jenner.com); [*mlieb@ecjlaw.com](mailto:mlieb@ecjlaw.com); [*mstout@foulston.com](mailto:mstout@foulston.com); Perez, Cheri; 'Reid A. Aronson'; Schwartz, Rachel; Alexander, Shauna; Siegel, Norm; Elizabeth, Sierra; [*sgilman@berkowitzoliver.com](mailto:sgilman@berkowitzoliver.com); [*tcunningham@lockelord.com](mailto:tcunningham@lockelord.com); Schult, Thomas; [*tmustaine@foulston.com](mailto:tmustaine@foulston.com); Crouse, Toby; [*walderman@orrick.com](mailto:walderman@orrick.com); [*perry.brandt@bryancave.com](mailto:perry.brandt@bryancave.com); EXTERNAL NCUA SDNY; Bird, Terry; Chi, Karis; Seltzer, Marc; Caforio, Bryan

Subject: RE: NCUA's Amended Responses and Objections to Defendants' First Set of Joint Interrogatories

Counsel – NCUA's amended interrogatory responses with a verification are attached. Other than the addition of the verification, nothing has changed.

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From: Dorris, Daniel V.

Sent: Monday, March 02, 2015 9:26 PM

To: 'Barbara S. Steiner'; CChiou@jenner.com; CGrabenstein@jenner.com; 'Faiza H. Alhambra (faiza.alhambra@huschblackwell.com)'; 'Gavin Campbell'; Shearer, Hannah; 'J. Matthew Goodin'; 'James Moloney'; 'Jane Alison Auxter'; Jordan, Jeffrey; Kalinowski, Jeff; Wieland, Jennifer; Shaw, John; 'Karina B. Sterman'; 'Lillian Grossbard'; 'Martin Loring'; 'Matthew J. Thomas'; 'Michael C. Lieb'; Stout, Mikel; Perez, Cheri; 'Reid A. Aronson'; Schwartz, Rachel;

Alexander, Shauna; Siegel, Norm; 'Sierra Eliabeth'; Gilman, Stacey; 'Thomas J. Cunningham'; Schult, Thomas; Mustaine, Timothy; Crouse, Toby; 'William F. Alderman'; Brandt, Perry; EXTERNAL NCUA SDNY; Bird, Terry; Chi, Karis; Seltzer, Marc; Caforio, Bryan

Subject: NCUA's Amended Responses and Objections to Defendants' First Set of Joint Interrogatories

Counsel, NCUA's amended responses and objections to Defendants' First Set of Joint Interrogatories are attached.

--

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